

Exhibit A

| Exhibit Name | Confidentiality Designation |
|----------------------------------------------------------------------------------|-----------------------------|
| Aundra Boykins Deposition Transcript | Confidential |
| Exhibit 1 Notice of Deposition | None |
| Exhibit 2 Drawing | None |
| Exhibit 3 Drawing | None |
| Exhibit 4 Alabama Department of Corrections Prosecution Waiver | HC-AEO |
| Exhibit 5 Plaintiff's Objections and Answer to Defendants' First Interrogatories | None |
| Exhibit 6 Alabama Department of Corrections Disciplinary Report | Confidential |
| Exhibit 7 Alabama Department of Corrections Disciplinary Report | Confidential |
| Exhibit 8 Alabama Department of Corrections Disciplinary Report | Confidential |
| Brian Casey Transcript | HC-AEO |
| Exhibit 1 Subpoena | None |
| Exhibit 2 Functional Analysis Doc. | Confidential |
| Exhibit 3 AR 302 | HC-AEO |
| Exhibit 4 Standard Operating Procedure 110 | HC-AEO |
| Exhibit 5 AR 403 | None |
| Exhibit 6 Letter | Confidential |
| Exhibit 7 Letter | Confidential |
| Exhibit 8 Weekly Activity Report | HC-AEO |
| Exhibit 9 Audio Recording | HC-AEO |
| Exhibit 10 Duty Officer Report | None |
| Exhibit 11 Incident Report | None |
| Exhibit 12 Incident/Offense Report | HC-AEO |
| Exhibit 13 Disciplinary Report | None |
| Cortez Whittington Deposition Transcript | None |
| Exhibit 1 Bates CORR 001217-1219 | Confidential |
| Exhibit 2 Diagram | None |
| Exhibit 3 Diagram | None |
| Dewayne Estes Deposition Transcript | HC-AEO |
| Exhibit 1 Complaint | None |
| Exhibit 2 Security Position Status | HC-AEO |

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| Exhibit 3 Statistical Report | None |
| Exhibit 4 Incident Report | Confidential |
| Exhibit 5 Incident Report | Confidential |
| Exhibit 6 Incident Report | Confidential |
| Exhibit 7 Incident Report | Confidential |
| Exhibit 8 Incident Report | Confidential |
| Exhibit 9 Inmate Movement History | Confidential |
| Exhibit 10 Incident Report | None |
| Exhibit 11 Roster | Confidential |
| Exhibit 12 Layout | HC-AEO |
| Exhibit 13 DOJ Investigation | None |
| Exhibit 14 DOC Reclassification | Confidential |
| Guy Noe Deposition Transcript | HC-AEO |
| Exhibit 1 Plaintiff's Fourth Amended Complaint | None |
| Exhibit 2 Investigation of Alabama's State Prisons for Men April 2, 2019 | None |
| Exhibit 3 Alabama Department of Corrections Monthly Statistical Report for May 2022 | None |
| Exhibit 4 Alabama Department of Corrections Monthly Statistical Report for December 2021 | None |
| Exhibit 5 Alabama Department of Corrections Administrative Regulation Number 212 | None |
| Exhibit 6 Alabama Department of Corrections Monthly Statistical Report for December 2017 | None |
| Exhibit 7 St. Clair Correctional Facility Schematic | HC-AEO |
| Jefferson Dunn Deposition Transcript | None |
| Exhibit 1 Letter | None |
| Exhibit 2 Email | HC-AEO |
| Exhibit 3 Email | HC-AEO |
| Exhibit 4 First Monitoring Report | HC-AEO |
| Exhibit 5 Investigation Policy | None |
| Exhibit 6 Email | HC-AEO |
| Exhibit 7 Monitoring Report | HC-AEO |
| Exhibit 8 Summary | HC-AEO |
| Exhibit 9 Incident Report | Confidential |

| Exhibit Name | Confidentiality Designation |
|----------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| Exhibit 10 Movement History | Confidential |
| Exhibit 11 Reclassification | Confidential |
| Joseph Rion Deposition Transcript | Confidential |
| Exhibit 1 Expert Report of Joseph P. Rion | None |
| Exhibit 2 Alabama Department of Corrections Duty Officer Report | None |
| Exhibit 3 Executive Order No. 725 | None |
| Exhibit 4 Declaration of Cortex Whittington | None |
| Exhibit 5 B Day Shift Roster, 12/2/17 | Confidential |
| Exhibit 6 Expert Report of Joseph P. Rion | None |
| Exhibit 7 Expert Report of Joseph P. Rion | None |
| Exhibit 8 Expert Report of Joseph P. Rion | None |
| Exhibit 9 Expert Report of Joseph P. Rion | None |
| Exhibit 10 State of Alabama Department of Corrections Inmate Movement Control, May 11, 2016 | HC-AEO |
| Exhibit 11 Deposition of Amanda Price | HC-AEO |
| Exhibit 12 Deposition of Guy Noe | HC-AEO |
| Exhibit 13 September 21, 2022, Letter to Joseph P. Rion from Brett M. Manisco | None |
| Exhibit 14 Investigation of Alabama's State Prisons for Men | None |
| Exhibit 15 The Alabama Prison Transformation Initiative | None |
| Exhibit 16 Alabama Department of Corrections 2018-2021 Strategic Plan | Confidential |
| Exhibit 17 Recruiting and Retaining Correctional Officers, A Report for the Alabama Department of Corrections, by Warren Averett | None |
| Exhibit 18 Guide for New Compensation Plan, July 2019 | None |
| Exhibit 19 Photocopy of Handwritten Notes of Joseph P. Rion, | None |
| Marc Walker Deposition Transcript | Confidential |
| Exhibit 1 Diagram | HC-AEO |
| Exhibit 2 SOP Inmate Movement Control | HC-AEO |
| Exhibit 3 SOP H - Unit Officer | HC-AEO |
| Exhibit 4 Sign-In Roster | Confidential |
| Exhibit 5 Duty Officer Report | None |
| Exhibit 6 Notice of Reclassification | None |

| Exhibit Name | Confidentiality Designation |
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| Exhibit 7 Inmate Movement History | Confidential |
| Exhibit 8 H Dorm Bed Roster | Confidential |
| Exhibit 9 Performance Appraisal | Confidential |
| Exhibit 10 DOJ Investigation | None |
| Brian Zawilinski Deposition Transcript | Confidential |
| Exhibit 1 Notice of Deposition | None |
| Exhibit 2 Zawilinski Resume | None |
| Exhibit 3 Expert Report of Brian Zawilinski | HC-AEO |
| Exhibit 4 SOP Number 119, Security Audits | HC-AEO |
| Exhibit 5 Engagement Letter | None |
| Exhibit 6 Invoice | None |
| Exhibit 7 SOP Number 137, Inmate Movement Control | HC-AEO |
| Exhibit 8 Plaintiff's Fourth Amended Complaint | None |
| Exhibit 9 Prosecution Waiver | HC-AEO |
| Exhibit 10 SOP No. 120, Use of Force | HC-AEO |
| Exhibit 11 SOP No. 067, H-Unit | HC-AEO |
| Mark Inch Deposition Transcript | Confidential |
| Exhibit 1 Expert Report of Mark S. Inch | Confidential |
| Exhibit 2 Presentation on Bed Capacity and Prison Consolidation by Mark Inch | None |
| Exhibit 3 "Florida Prison Guard Changes Pitched For 'System In Crisis'" | None |
| Exhibit 4 St. Clair Correctional Facility, Google Earth | None |
| Exhibit 5 SOP Number 137, Inmate Movement Control | HC-AEO |
| Exhibit 6 Notice of Deposition | None |
| Exhibit 7 Objections and Responses to Plaintiff's Notice of Deposition and Requests for Production | None |
| Exhibit 8 Engagement Letter, August 24, 2022 | None |
| Exhibit 9 Executive Order No. 725 | None |
| Exhibit 10 Declaration of Cortez Whittington | HC-AEO |
| Exhibit 11 Inmate Body Chart Documents Form, Boykins | HC-AEO |
| Exhibit 12 Inmate Body Chart Documents Form, Whittington | HC-AEO |
| Exhibit 13 Whittington Deposition Transcript, October 4, 2022 | None |

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|---------------------------------------------------------------------------------|-----------------------------|
| Exhibit 14 Duty Officer Report and Incident Report | None |
| Exhibit 15 ADOC Investigation and Intelligence Divisions Weekly Activity Report | HC-AEO |
| Exhibit 16 Disciplinary Report | None |
| Exhibit 17 Memorandum To Institutional Enemies Validation Committee | None |
| Exhibit 18 Prosecution Waiver | HC-AEO |
| Exhibit 19 Alabama Uniform Incident/Offense Report | HC-AEO |
| Exhibit 20 Summary Partial Compliance/Non-Complaint | HC-AEO |
| Exhibit 21 Email chain, FW: Security Audits - DOJ Request | None |
| Exhibit 22 Marc Walker Deposition Transcript, August 9, 2022 | Confidential |
| Exhibit 23 Melinda Allen Deposition Transcript, October 11, 2022 | None |
| Exhibit 24 Melinda Allen Resume | None |
| Exhibit 25 Allen PREA Audit for EJI | Confidential |
| Exhibit 26 Brian Casey Deposition Transcript, September 29, 2022 | HC-AEO |
| December 2, 2017 Duty Post Log | Confidential |
| St. Clair Standard Operation Procedure #31 | HC-AEO |
| UAB Medical Records of Plaintiff | Confidential |
| Administrative Regulation #331 | HC-AEO |
| Cortez Whittington's Institutional File | Confidential |
| Cortez Whittington's Body Chart | HC-AEO |
| Plaintiff's Movement History | Confidential |